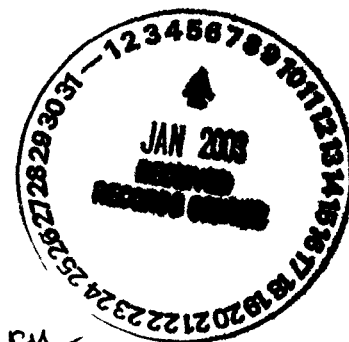




INTEROFFICE CORRESPONDENCE



DATE October 7, 1993

TO N S Demos, Facility Operations Management, Bldg 080, X6938

FROM M F McHugh, Remediation Project Management, Bldg 080, X8624 *mfu*

SUBJECT SOIL DISTURBANCE AND SPILL ACTIVITIES IN OPERABLE UNIT 13 - MFM-024-93

Several problems surfaced the week of September 27 through October 1, 1993 with regards to soil disturbance permits and spills in Operable Unit (OU) 13. I have several concerns that I feel need to be addressed

- # 1 Central Avenue Ditch Maintenance — The soil disturbance permit called for any of the soil or ditch sediments removed from the ditch bottom to be incorporated into the banks of the ditch. In the area of individual hazardous substance site (IHSS) 152, ditch sediment was spread out some 30-40 feet from the ditch. Upgradient in IHSS 157 1, the sediments were piled in an area outside the mapped IHSS boundary.
- # 2 Construction of a new drainage ditch along the boundary of IHSS 158 and IHSS 117 2 — I was not notified in advance of these activities. Sampling points located the previous day near the newly constructed ditch will have to be relocated. In addition, Plant Services was using a grader that was leaking antifreeze to construct the ditch.
- # 3 A leak of #6 fuel oil on Friday, September 24, 1993 which contaminated soils in IHSSs 157 1 and 191 was not reported to me. Several drums of contaminated soils are now stored on the IHSS.
- # 4 The soil removed from the area surrounding the leaking piping serving the underground gasoline storage tanks behind (north) building 331 in IHSS 134(S) is not being managed correctly.
- # 5 The cleanup and characterization of a small mineral oil spill in IHSS 117 1 has not been completed.
- # 6 I was notified by K K Allison, Regulated Waste Operations, that they were seeking to spread soil from the #1 RCRA storage area in IHSS 197 without having it characterized.
- # 7 I was notified by K K Allison, Regulated Waste Operations, that they were seeking to repave the floor of the Tent #1 and dispose of the scabbled pavement, without characterization, to the area where the newly constructed ditch is along the boundary of IHSS 158 and IHSS 117 2.

Requested Actions

All Items — I would like a copy of each soil disturbance permit or report of leak and any related correspondence for the OU 13 files

Item #1 — I will arrange for the High Purity Germanium (HPGe) survey of one of the points along Central Avenue that was surveyed prior to ditch excavation. Please arrange for a surficial soil sample to be taken at each of the two points where sediments were deposited south of the IHSS 157 1 boundary west of Sixth Avenue. Analysis should include radionuclides and TAL metals. A list of applicable detection limits is available in the OU 13 Phase I RCRA [Resource Conservation and Recovery Act] Facilities Investigation/Remedial Investigation (RFI/RI) Work Plan. The sample location should be surveyed and monumented per Revised GT 08*. I would like a copy of the analytical results.

Item #2 — I will arrange for the relocation of the survey points. In the future, I would like to see a written copy of any soil disturbance plan within OU 13. I will be recommending that OU managers approve with signature all soil disturbance.

Item #3 — Each drum of contaminated soil removed from IHSSs 190 and 157 1 should be sampled and characterized. I would like a copy of the analytical results.

Item #4 — Please direct S. R. Hughes, RCRA Regulatory Programs, to properly manage the excavation per the soil disturbance permit. I will cooperate with any interim remediation as needed. Please provide a brief written summary of the tasks completed to date and contacts with RCRA Regulatory Programs. Information on contaminants of concern for IHSS 134 (S) is available in the OU 13 Phase I RFI/RI Work Plan. I would like a copy of the analytical results.

Item #5 — Please direct RCRA Regulatory Programs to finish the cleanup and characterization of the spill. Information on contaminants of concern for IHSS 117 1 is available in the OU 13 Phase I RFI/RI Work Plan. I would like a copy of the analytical results.

Item #6 — Please have Regulated Waste Operations characterize the waste in each of the waste crates stored in IHSS 197. Information on contaminants of concern for IHSS 197 is available in the OU 13 Phase I RFI/RI Work Plan. I would like a copy of the analytical results. Be advised that recent HPGe survey results from this IHSS indicate that above background amounts of americium may be present. This may trigger the need to repackage that waste in white drums.

Item #7 — Please forward a copy of the proposed soil disturbance plan and a proposed schedule for this repaving project to me as soon as possible. I would like to have the soil under the pavement sampled. In addition, I understand that there may be problems with a spring or a high water table at this location. If any water is encountered, it should be sampled. If that proves to be a valid concern, a hydrogeologic characterization of the area should occur before repaving occurs. If there have been

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any spills in Tent #1, please arrange for a copy of the spill reports to be forwarded to me for the
OU 13 project files

I realize this is a rather long list of requests. Please let me know if any of these are unreasonable
or provide me with a schedule of when they can be accomplished by Friday, October 8, 1993

dmf

cc

K K Allison
M C Broussard
W S Busby
M L Crossett
K A Holstein
S R Hughes
B D Peterman